

Naval Air Station Brunswick)
Cumberland County)
Brunswick, Maine)
A-268-71-V-A)

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Naval Air Station Brunswick (NASB) of Brunswick, Maine was issued Air Emission License A-268-71-T-R on April 21, 2000, permitting operation of emission sources associated with their military flight operations facility.

NASB has requested an amendment to their license in order to incorporate the replacement of two of the generators. The 50 kW generator #24 in building 537 (which was not required to be licensed due to size) is being replaced with an 80 kW, 14.8 gal/hr Onan DGDA-4484945 diesel generator. This unit will burn low sulfur diesel fuel with a maximum sulfur content not to exceed 0.05% by weight. The 50 kW unit will be removed and disposed of off base. In addition, the 200 kW emergency diesel located in building 209 is being replaced with an Olympian FRAM-LL5014F of the same size firing low sulfur diesel fuel with a maximum sulfur content not to exceed 0.05% by weight, therefore there will be no change in emissions for this unit.

B. Application Classification

A new emission unit at a minor source is considered a major modification based on whether or not expected emission increases exceed the "Significant Emission Levels" as given in Maine's Air Regulations. The emission increases for a new source are determined by the maximum future license allowed emissions, as follows:

<u>Pollutant</u>	<u>Max. Future License (TPY)</u>	<u>Sig. Level</u>
PM	0.06	100
PM ₁₀	0.06	100
SO ₂	0.03	100
NO _x	2.3	100
CO	0.48	100
VOC	0.18	50

Naval Air Station Brunswick)
Cumberland County)
Brunswick, Maine)
A-268-71-V-A 2

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

The modification is non-major for all criteria pollutants. However, since all emissions associated with this modification will increase, all criteria pollutants are subject to Best Available Control Technology (BACT) requirements.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Air Regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for new sources and modifications requires a demonstration that emissions are receiving Best Available Control Technology (BACT), as defined in Chapter 100 of the Air Regulations. BACT is a top-down approach to selecting air emission controls considering economic, environmental and energy impacts.

B. Building 537 and 209 Generators

NASB will operate the generators in building 537 and 209 for back-up purposes should there be a loss of power to the facility. These units are rated at 80 and 200 kW, respectively, and shall be limited to the firing of low sulfur diesel fuel with a maximum sulfur content not to exceed 0.05% by weight. In conjunction with the above requirement and the existing annual diesel fuel use limit for the facility, these units will meet the requirements of BACT.

III. AMBIENT AIR QUALITY ANALYSIS

According to the Maine Regulations Chapter 115, the level of air quality analyses required for a minor new source shall be determined on a case-by case basis.

Based on the information available in the file, and the similarity to existing sources, Maine Ambient Air Quality Standards (MAAQS) will not be violated by this source.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

Naval Air Station Brunswick)
Cumberland County)
Brunswick, Maine)
A-268-71-V-A **3**

Departmental
Findings of Fact and Order
Air Emission License
Amendment #1

The Department hereby grants Air Emission License A-268-71-V-A subject to the conditions found in Air Emission License A-268-71-T-R, and in the following conditions:

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions.
- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115.
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both.
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request.
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. § 353.
- (6) The license does not convey any property rights of any sort, or any exclusive privilege.
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions.
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.

- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license.
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license.
- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- (i) perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - a. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - b. pursuant to any other requirement of this license to perform stack testing.
 - (ii) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - (iii) submit a written report to the Department within thirty (30) days from date of test completion.
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- (i) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

- (ii) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
- (iii) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.
- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation.
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.
- (16) Building 537 Generator
- A. The building 537 generator shall be limited to the firing of low sulfur diesel fuel with a maximum sulfur content not to exceed 0.05% by weight, as demonstrated by purchase receipts from the supplier.

B. Emissions from the building 537 generator shall not exceed the following:

Equipment		PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Bldg 537 Generator	lb/hr	0.24	0.24	0.10	9.0	1.9	0.71

Naval Air Station Brunswick)
Cumberland County)
Brunswick, Maine)
A-268-71-V-A 6

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

- C. Visible emissions from the building 537 generator shall not exceed 30% opacity based on a six (6) minute block average basis, except for no more than two (2) six (6) minute block averages in a 3-hour period.
- D. NASB shall adhere to the requirements of license A-268-71-T-R for the recordkeeping requirements for fuel deliveries as well as the annual facility-wide diesel fuel limit.
- (17) Building 209 Generator
The newly replaced generator in building 209 shall be limited to all of the same conditions as stated in license A-268-71-T-R for the previous generator.
- (18) This amendment shall expire concurrently with Air Emission License A-268-71-T-R.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2000.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: September 13, 2000

Date of application acceptance: October 2, 2000

Date filed with the Board of Environmental Protection: _____

This Order prepared by Stephanie C. Toothaker, Bureau of Air Quality